



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

TE  
9/12/15  
AP

February 19, 2015

**MEMORANDUM**

**SUBJECT:** Documentation of Achievement of GPRA Facility-wide Corrective Action Complete (CA999NF)

**FROM:** David Vogler, Geologist *[Signature]* 2/9/2015  
RCRA State and Tribal Oversight Section (6PD-O)

**THRU:** Randall Rush, Section Chief *RR* 3/3/15  
RCRA State and Tribal Oversight Section (6PD-O)

**TO:** RCRA Technical Files

**RE:** Baylor College of Medicine  
EPA ID No. TXD988070082 *[Checkmark]*

Based on review of all available relevant information on known or reasonably suspected releases to soil, groundwater, surface soil, sediments, and air, subject to RCRA Corrective Action, e.g. from Solid Waste Management Units (SWMUs), Regulated Units (RUs), and Areas of Concern (AOCs), the following determination has been made:

**Corrective Action Process Terminated - No Further Action:** The corrective action process for the entire facility has been completed; the active remedial measures, as specified in the RCRA permit, enforcement order or other mechanism are completed for the entire facility (CA999NF).

This determination is made 1) after the Certification of Remedy Completion or Construction Completion (CA550) and/or 2) after stabilization measure(s) has been completed in a manner that meets the stabilization objectives, goals, performance standards, and/or desired results (CA650), and terminating corrective action at this point, at the facility, would satisfy all permit, order, or other mechanism requirements for corrective action.

Baylor College of Medicine is a private medical school that provides medical services to the college's six affiliated teaching hospitals. The college generated various hazardous wastes through medical laboratory research activities, support activities, and a surplus chemical exchange program. The college retrofitted a 0.042-acre section of an existing building on its property at 3325 Yellowstone Boulevard, Houston, Texas, to be used as a container storage area. The unit has a capacity to store up to the equivalent of 200, 55-gallon drums that contain various

hazardous waste, primarily lab packs and flammable liquids. Baylor reported no spills or releases to the environment from the unit. Baylor is considered a small quantity generator.

A RCRA Facility Assessment (RFA), which included a visual site inspection, reported no impacts in the nearby soils and surface waters. This conclusion was confirmed by TNRCC in a file review. Therein, this determination of "Corrective Action Process Terminated-No Further Action" is made.

This determination is protective of human health and the environment. It completes the RCRA corrective action process under HSWA, at this time. In some instances, performance of required operation and maintenance and monitoring actions and/or maintenance of institutional controls may be ongoing, consistent with EPA's February 2003 document, *Final Guidance on Completion of Corrective Action Activities at RCRA Facilities* (68 FR 8757). This determination will be re-evaluated if the regulatory agencies or the facility become aware of significant information regarding the facility, which would change the conditions. The facility must continue to comply with all applicable parts of RCRA.



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RCRA Tech

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